

STEPHANIE QUINTERO ATTORNEY AFFIRMATION:
ATTORNEY OF RECORD FOR J.G.G.

I, Stephanie Quintero, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief:

1. My name is Stephanie Quintero, and I am licensed to practice law in California and Oregon. I have been licensed to practice law in California since March 15, 2024, and I have been licensed to practice law in Oregon since May 22, 2020. I am the attorney of record for J.G.G. before the Executive Office of Immigration Review. J.G.G. has relayed the following to me.
2. J.G.G. was born in Venezuela in 1994. Prior to being detained, he was living in Pittsburg, California. He is currently detained at the El Valle Detention Facility in Raymondville, Texas.
3. J.G.G.'s only entry into the United States was on March 25, 2024, through El Paso, Texas. He came to the United States because he feared being killed, arbitrarily imprisoned, beaten and tortured by Venezuelan police since they already tortured, arbitrarily imprisoned, and beat him in the past. He fears that the Venezuelan police and government will target him because of his actual/imputed political opinion, his familial connection who is a known political dissident, and because the U.S. government erroneously suspects that he is a Tren de Aragua member. Due to this fear, J.G.G. is seeking asylum, withholding, and CAT protection before the immigration court in Adelanto, California. He is awaiting a hearing on the merits of his applications for protection.
4. ICE erroneously claims that he is a Tren de Aragua member. However, J.G.G. has repeatedly denied being a Tren de Aragua member. J.G.G. has affirmed that he has never been a member of or associated with Tren de Aragua in any way, that he has never been convicted of any crime anywhere in the world, and he has never been a member or associated with any other criminal organization. The sole reason ICE claims that he is a Tren de Aragua member is because of his tattoos.
5. J.G.G. was instructed by ICE to come to their office on October 3, 2024, for an interview. During the interview, he was detained by ICE because they erroneously suspected that he was a Tren de Aragua member on account of his tattoos. J.G.G. is a tattoo artist, and he told ICE that none of his tattoos are associated with Tren de Aragua. One of the two tattoos that ICE questioned him about is a tattoo of an eye. J.G.G. noted he got the eye tattoo because he saw it on Google, and he thought it looked cool. A friend who is a professional tattoo artist did the tattoo for him. Another tattoo that ICE questioned him about is a tattoo of a rose and skull. J.G.G. noted he got the tattoo because he previously had a monkey tattoo that he wanted to cover up.

6. J.G.G. was taken to Golden State Annex (GSA) in McFarland, California on October 4, 2024, and was detained there until March 6, 2025. On March 6, 2025, at approximately 2am, he was awoken, taken out of his cell and told that he was being released and made to sign papers in English, which is not his native language. He asked what the papers were concerning, and was told that he was being released, and the papers were to get his property returned to him. He signed the papers under the false pretext that he was being released. He was not released and instead taken to an unknown location. He called his friend and me frantically because he was terrified and he did not know what was happening. He was then transferred to El Valle Detention Facility in Raymondville, Texas, but he did not learn his destination until he arrived. When he got to El Valle Detention Facility, he met other Venezuelans who were also recently transferred there. He learned that these other Venezuelans, like him, do not have any criminal history and are suspected Tren de Aragua members.
7. On March 14, 2025, at approximately 3am, he was awakened and was told that he was going to be transferred elsewhere. The guards told him to grab all his things because he was going to be taken elsewhere. He asked the guards where they were taking him, but they said that they did not know, and they refused to give him more information. Soon after, they told him that the plane that he was supposed to get on malfunctioned and that he would be taken elsewhere either at night on March 14, 2025, or in the morning on March 15, 2025. He then returned to his dorm.
8. On March 15, 2025, guards took him as well as several other detainees out of their dorms at about 7 am and told them that they would be taken to Port Isabel, Texas. They put the detainees in a cramped room in El Valle Detention Center for hours. The guards then took J.G.G. and the other detainees that were in the room and loaded them onto buses. They were chained from top to bottom—wrists, waist, ankles, chains, which came up through their backs, so they could barely move. J.G.G. and the other detainees believed they were being taken to Port Isabel, Texas. However, they were taken instead to an airport.
9. Later that day, J.G.G. and the other detainees were put on three planes. Shortly thereafter, J.G.G. as well as several other Venezuelan detainees were taken off the plane before it departed pursuant to a TRO against Alien Enemies Act removals issued by Judge Boasberg of the U.S. District Court for the District of Columbia in which J.G.G. was named. Everyone else that was put on a plane stayed on the plane. As J.G.G. and the other detainees were taken off the plane, an ICE Agent named Daniel Cantun verbally taunted them, he told them: “you all do not know how lucky you are, and you all hit the lottery because you are not getting deported today.”
10. J.G.G. and the other detainees were then put on a bus which contained several other detainees. Once they were back on the bus, which was hot, one of the detainees almost passed out from heat exhaustion and dehydration and started bleeding

profusely from his nose. The detainees notified the guards, but they did not provide that person with medical attention. Instead, the guards just told him to clean up his nose. Some detainees on the bus told J.G.G. that some of the detainees who were placed on the plane for deportation had recently been picked up from their houses or jobs and quickly processed for deportation.

11. J.G.G. and the other detainees were then taken back to the El Valle Detention Facility. They were not given food or water until about late in the evening, a few hours after they arrived back. J.G.G. is currently at El Valle.
12. J.G.G. notes that since he and other detainees were never told where they were being taken to, they all had to make guesses about where they were being taken. Some of the detainees and he thought they were going to Venezuela. Others thought they were going to another part of the USA.
13. J.G.G. notes that he was never told that he was being deported because he was being classified as an Alien Enemy. He was never given a paper to that effect. He never knew that he was supposed to be deported until he got to the airport. The other detainees and he were just given a vest that said Port Isabel on it. Port Isabel is another detention facility in Texas. He was never told that the plane that he boarded was going to El Salvador.
14. J.G.G. only found out that the planes went to El Salvador because he saw it in the news after he got back to the detention center.
15. Nor was I, as his attorney provided any notice that he was being deported to El Salvador or that he was being classified under the Aliens Enemy Act.

I declare under penalty of perjury that I am accurately relaying what my client told me and the foregoing is true and correct to the best of my knowledge.

/s/ _____
Stephanie Quintero, Esq.
Executed this 8th day of April, 2025